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August 15, 2005

Ms. Jan Palumbo, RCRA Project Manager
United States EPA, Region 10
1200 Sixth Avenue, Mail Stop WCM-121
Seattle, WA 98101

Subject: **August 15, 2005, Progress Report
J.H. BAXTER ARLINGTON FACILITY
Docket No. RCRA-10-2001-0086**

FILE COPY

Dear Ms. Palumbo:

This letter provides the August 15, 2005, progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from July 15, 2005, to August 15, 2005.

Significant Developments This Period

This section discusses significant developments for the referenced reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- Baxter and Premier Environmental Services met with U.S. Environmental Protection Agency (EPA) staff on July 25, 2005, to discuss the Site Investigation results and progress on the AOC.

Anticipated Developments Next Period

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will submit a letter to EPA outlining a "bail-test" study for extraction of nonaqueous phase liquids, as well as plans for a "Supplemental Dissolved Phase Groundwater Study" during the next reporting period.
- Baxter plans to meet with EPA on September 12, 2005, to discuss potential technologies that will be evaluated as part of the Corrective Measure Study.

Anticipated Problems and Problem Resolution

This section discusses anticipated problems, and planned resolution of past or anticipated problems.

- No new problems or issues have been identified at the facility.



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Other Information

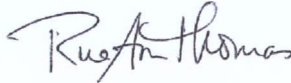
Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- Baxter has continued settlement discussions with EPA regarding In the Matter of J.H. Baxter and Company, Arlington, Washington EPA #ID WAD 053823019, and on August 1, 2005, submitted a Revised Closure Report in connection with the discussions.
- Baxter conducted groundwater sampling during the week of August 8, 2005, in accordance with Snohomish County closed woodwaste landfill regulations.

Certification

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:



Name: RueAnn Thomas
Title: Environmental Programs Director
Date: August 15, 2005

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (541) 689-3801.

Sincerely,



RueAnn Thomas
Environmental Programs Director

cc: Jeanne Tran, Ecology
Georgia Baxter, J. H. Baxter & Co.
Mary Larson, J. H. Baxter & Co.
J. Stephen Barnett, Premier Environmental Services, Inc.